

1 **IN THE UNITED STATES DISTRICT COURT**
2 **FOR THE DISTRICT OF ARIZONA**

3 IN RE BARD IVC FILTERS
4 PRODUCTS LIABILITY LITIGATION

5 No. 2:15-MD-02641-PHX-DGC

6 This Document Relates to:

7 Julia Nichols

8 Civil Action No.: 2:17-cv-00868-DGC

9 **MOTION FOR SUBSTITUTION OF COUNSEL**

10 Counsel moves this Court for an Order substituting Matthew R. McCarley of Fears
11 Nachawati, PLLC, in place of, Joseph J. Cappelli of Bern Cappelli.

12 1. Plaintiff Julia Nichols, requests that she be represented by Matthew R. McCarley of
13 Fears Nachawati, PLLC. (See the Consent Orders Granting Substitution of Attorney, attached
14 hereto as Exhibit A).

15 2. Joseph J. Cappelli of Bern Cappelli consents to this substitution (See the Consent
16 Orders Granting Substitution of Attorney, attached hereto as Exhibit A).

17 3. Based on the foregoing, Julia Nichols requests that this Court grant her request for
18 substitution of Matthew R. McCarley of Fears Nachawati, PLLC in this action.

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1 Date: September 3, 2019

Respectfully submitted,

2 **FEARS NACHAWATI**

3 By: /s/ Matthew R. McCarley

4 Matthew R. McCarley

Texas Bar No. 24041426

mccarley@fnlawfirm.com

5 **FEARS NACHAWATI, PLLC**

6 5473 Blair road

Dallas, TX 75231

7 *Attorney for Plaintiff*

8 **CERTIFICATE OF SERVICE**

9
10 I hereby certify that on this 3rd day of September, 2019, I electronically transmitted
11 the attached document to the Clerk's Office using the CM/ECF System for filing and
12 transmittal of a Notice of Electronic Filing.

13 /s/ Matthew R. McCarley

14 Matthew R. McCarley